EUROPEAN SEX WORKERS' RIGHTS ALLIANCE NOVEMBER 2024

Labour rights, safety and privacy:

How to centre sex workers' needs on advertising platforms

About ESWA

The European Sex Workers' Rights Alliance (ESWA) is a sex worker-led network proudly representing more than 100 organisations in 30 countries across Europe and Central Asia. Our aim is to ensure that all sex workers' voices are heard and that their human, health and labour rights are recognised and protected. With our actions and approach inspired by our membership community, we work to build a strong, vibrant and sustainable network that mobilises national, regional and international advocacy activity that moves us towards long-term, systemic change.

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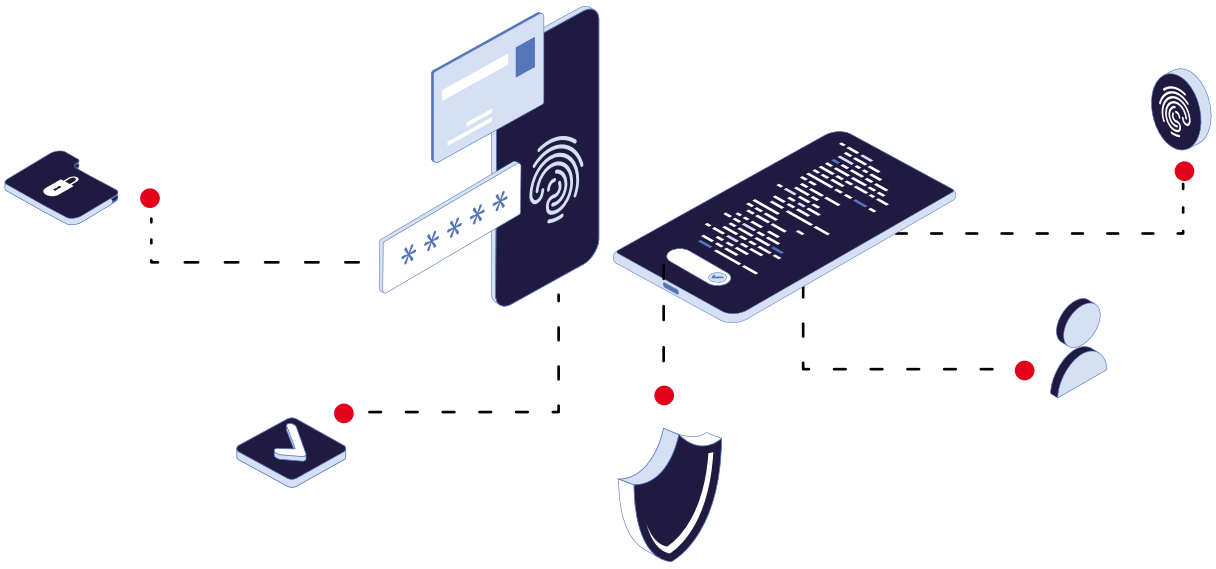
Introduction

Sex workers are increasingly using specialised adult entertainment and advertising platforms to connect with clients, negotiate terms, receive payments, implement harm reduction strategies and find community support. Sex workers and sex worker-led organisations have long argued that platforms influence their working practices, creating both new challenges and opportunities. By focusing on sex workers' experiences, these individuals and organisations advocate for platforms that are more inclusive of sex workers' needs and for an internet that is built around their contextual requirements *(Blunt & Wolf, 2020; Blunt et al., 2020; Drndarevska, 2024; ESWA, 2022; ESWA, 2023a; ESWA, 2023b; Stardust et al., 2020)*. Building on these efforts, this briefing paper examines how sex work advertising platforms can better safeguard sex workers' health and safety and uphold their labour and human rights.

This ESWA community report begins with an overview of current literature on sex advertising platforms, illustrating how these platforms shape working conditions. Following this, we present findings based on qualitative data collected through focus groups and interviews with sex workers and platform operators. In our analysis we first explore how sex workers navigate and use these platforms, emphasising their priorities, needs and strategies. We then examine how societal norms and regulatory policies impact the structure and functioning of these platforms, affecting sex workers' experiences. Finally, we outline practical and actionable recommendations for platform design, features and policies to better serve sex workers by centring their needs.



Literature Review

Sex work advertising platforms function both as online workspaces and as intermediaries for sex workers. These platforms profit from the exchange of sexual services, either by taking a portion of payments made for services or by charging for advertising *(Jones, 2020; Rand, 2019)*. Some platforms exclusively facilitate in-person meetings by listing escort or other sexual service ads, while others support digital-only practices such as live-streamed shows (webcamming), the sale of pre-recorded clips, and audio calls *(Jones, 2020; Rand, 2019)*. Sex workers often use multiple platforms and combine various modes of work (online and in-person) to diversify their income *(Swords et al., 2023)*. For example, workers may create and promote profiles on different platforms simultaneously. However, it is essential to distinguish between in-person and digital-only sex work when analysing how platforms impact labour practices, as in-person work generally associated with greater health and safety risks and is subject to stricter legislation *(Hardy & Barbagallo, 2021)*. Consequently, this briefing paper focuses on platforms used for in-person sex work.

Sex work is frequently categorised as informal, unprotected labour and rarely recognised as legitimate employment. As a result, it is subject to social stigma, criminalisation and restrictive regulation *(Hardy & Cruz, 2019)*. Platforms have become central to on-demand and gig labour, reshaping working conditions. Studies on gig work outside of sex work, such as Uber driving and delivery services, highlight risks such as the erosion of social and labour rights and declining labour standards *(Graham & Joe, 2017)*. However, sex work has historically existed outside traditional wage labour and is a vital income source for people excluded from the formal labour market *(Berg, 2022)*. Additionally, many sex workers experience intersecting forms of marginalisation and discrimination, such as those based on race, migration status, gender identity, or sexuality. They often face compounded discrimination. Sex workers using advertising platforms not only encounter the challenges typical of gig work but must also navigate a context where their labour and identities are frequently stigmatised and criminalised. To understand how sex work advertising platforms can be improved, it is vital to consider these unique characteristics of sex work and platform-mediated labour together.

Platforms present both opportunities and risks for sex workers. Importantly, many sex workers use the Internet to find and negotiate with clients *(Castle & Lee, 2008; Lee-Gonyea et al., 2009)*. This is further facilitated by platforms dedicated to advertising adult services, including full-service or other forms of in-person sex work, reducing reliance on third parties *(Blunt & Wolf, 2020)*. Advertising platforms have also enabled sex workers to develop safety strategies, such as screening procedures and 'bad date' lists to avoid dangerous individuals *(Campbell et al., 2019; MacPhail et al., 2014; Minichiello et al., 2013)*. Additionally, by moving online, sex workers can avoid street-based policing and surveillance *(Cunningham & Kendall, 2011; Minichiello et al., 2013)*. Some

researchers therefore suggest that advertising platforms have increased both safety and work opportunities for sex workers *(Campbell et al., 2019; Sanders et al., 2018; Sanders et al., 2016)*. Platforms also allow sex workers to connect and share information with others, fostering solidarity and mutual aid *(Feldman, 2014)*.

Although much research highlights the positive aspects of online platforms for sex workers, some scholars warn against overly optimistic views *(Scoular et al., 2019)* and technological determinism, where technology is considered the primary driving force for change and solution for societal problems *(Jones, 2015)*. They argue that such perspectives can obscure emerging risks of online work, such as intimate image abuse, doxing and stalking *(Redman & Waring, 2021; Sanders et al., 2018)*. Many platforms require personal information from sex workers but often lack adequate protection measures *(ESWA, 2023b)*. Given that the social and legal contexts stigmatise and criminalise sex workers, robust privacy protections are essential for their safety *(Koening et al., 2022)*. While sex workers develop their own privacy strategies, they are often labour-intensive and complex *(Campbell et al., 2019; Nelson, 2019)*. This highlights the need for platforms to prioritise user safety and privacy.

Recent studies have become increasingly critical of platforms and their effects on sex workers' working conditions *(Hardy & Barbagallo, 2021; Rand & Stegeman, 2023)*. Beyond digital security risks, researchers have examined how platform structures and business models shape labour conditions. Design elements, affordability, and terms of use can all impact working conditions. Similarly, features like ranking systems and specific search terms encourage competition among sex workers, while reviews from clients can pressure workers to negotiate boundaries to avoid negative reviews, affecting both income and safety *(Hardy & Barbagallo, 2021)*.

Sex workers advertising on platforms face the increased burden of unpaid labour to attract clients. They must maintain profiles, upload content (photos, descriptions and videos) and communicate with clients *(Hardy & Barbagallo, 2021)*. Moreover, competing in the market often requires maintaining a consistent online presence across multiple platforms. This may include sharing intimate images online and on multiple platforms to reach a broader audience, which, while increasing income opportunities, also heightens risks of image abuse, stalking and being deplatformed. The issue of deplatforming on social media platforms, where the platforms ban sex workers and their content, is under current investigation by ESWA, with findings to be published in 2025 in a separate ESWA community research report.

It is also important to note that the opportunities and risks posed by advertising platforms are not evenly distributed. For instance, not all sex workers have access to platforms, with marginalised individuals often lacking the resources to afford advertising fees or the unpaid labour time required to advertise effectively online *(Argento et al., 2018)*. Research shows that algorithmic ranking and terms and conditions may perpetuate inequalities, discriminating against racialised and gender non-conforming workers *(Jones, 2015; Rand & Stegeman, 2023)*. Barriers to online access can push some workers to rely on social media or street-based solicitation, especially for those unable to work in licensed venues typically

reserved for cisgender women *(Koening et al., 2022)*. Trends in gentrification, urban planning and criminalisation are reducing physical spaces for sex work, while the increase in online advertising makes it harder for those without platform access to find suitable in-person workspaces *(Argento et al., 2018; Henham, 2021)*. These studies underscore the importance of examining the inequalities fostered by advertising platforms through an intersectional lens.

Facial recognition technologies and ID verification requirements on advertising platforms pose additional risks for sex workers, disproportionately affecting marginalised groups. For instance, individuals whose gender identity does not align with legal documentation or those without government-issued ID, such as undocumented migrants, face extra barriers to entry *(Koening et al., 2022; Cunningham et al., 2018)*. The growing use of facial recognition technologies also heightens privacy concerns, with platforms rarely disclosing data management practices for sensitive data gathered through such invasive technologies. Although it is unclear the extent to which platforms share personal information with authorities, data sharing upon government request is confirmed by some platforms *(Hall, 2023)*. Sex workers report being flagged at borders due to data sharing and facial recognition use *(Hall, 2023; Snow, 2023)*. Police raids on advertising platforms, such as Rentboy and Eros in the U.S., also leave workers vulnerable to personal data exposure, particularly in criminalised environments.

While platforms regulate user activity through terms of service, design and features, they are themselves regulated by state and regional laws. Laws criminalising sex work often exacerbate rather than mitigate professional risks, deteriorating working conditions *(Scoular, 2015)*. Neo-abolitionist, or so-called end-demand, legislation conflates trafficking with consensual sex work, focusing on punitive measures that neglect sex workers' labour rights *(Musto, 2016; Musto et al., 2021)*. Researchers argue that regulatory focus on anti-trafficking frameworks often results in restrictive measures that increase risks for sex workers *(Campbell et al., 2018; Scoular et al., 2019)*. Rather than promoting human and labour rights for sex workers, such legislative approaches lead to oppressive regulations, increased policing and criminal justice responses. Preliminary UK research suggests platforms could play a key role in trafficking prevention but require adjustments to safeguard consensual workers *(Sanders & Keighley, 2023)*.

Transnational impacts of U.S. legislation, such as Fight Online Sex Trafficking Act (FOSTA) and Stop Enabling Sex Traffickers Act (SESTA), illustrate the global consequences of anti-sex work laws on platforms. The 2018 FOSTA-SESTA legislative package removes platform immunity for content seen as facilitating prostitution while conflating trafficking with consensual sex work. This led some platforms to shut down globally, impacting sex workers who relied on them for advertising *(Albert et al., 2020)*. To avoid liability, many general-purpose platforms have broadly banned sexual content, impacting workers' income and excluding them from digital spaces *(Tripp, 2019)*. European countries with similar legislation also see platforms forced to remove sex work ads, further reducing advertising options for workers. For example, the Spanish 'Sexual Freedom Law' that came into effect in 2022 penalises advertising platforms with fines that can go up to 100,000 € *(El Pais, 2023)*, which led to the forced closure of 14 advertising platforms, as well as changes to platform terms and conditions rendering it more difficult for workers to

advertise their services effectively *(Turner, 2023)*. The UK's new Online Safety Act mirrors FOSTA-SESTA's effects, likely causing similar outcomes *(English Collective of Prostitutes, 2022)*.

Platform shutdowns often push sex workers to rely on more labour-intensive and riskier methods to find clients, limiting possibilities for harm reduction and safety strategies *(Blunt & Wolf, 2020; Musto et al., 2021)*. Workers may turn to social media, where they face high risks of de-platforming and account loss, affecting income *(Blunt & Stardust, 2021; Hamilton et al., 2022)*. Research highlights that platforms provide critical safety mechanisms but often operate within hostile social and regulatory environments. Even with these challenges, sex workers actively navigate and resist these barriers, advocating for better platform accountability and, in some cases, operating worker-led platforms *(Hardy & Barbagallo, 2021; Rand & Stegeman, 2023)*. This underscores the importance of centring sex workers' experiences in platform design, regulation and operation. Addressing this need, the next section foregrounds sex workers' perspectives, outlining what platform features and policies could better protect their health and safety.

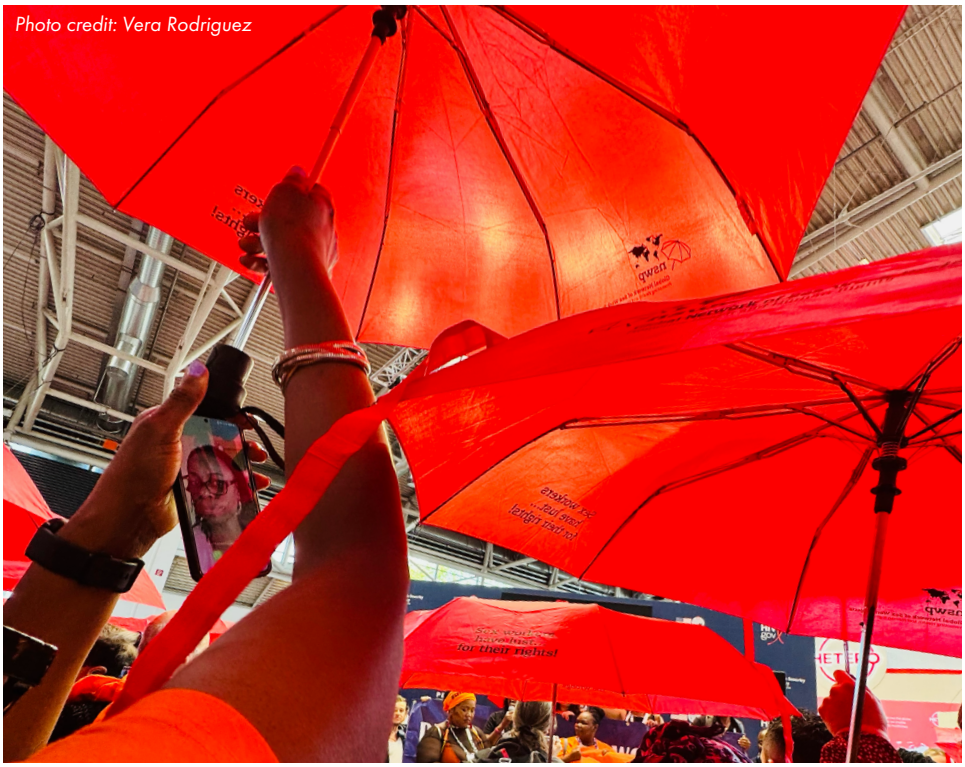


Photo credit: Vera Rodriguez

Findings from the ESWA Consultation

Methods

ESWA collected qualitative data from April to July 2024 through a focus group and in-depth semi-structured interviews with sex workers and platform owners.

The focus group took place in April 2024 during the ESWA event, 'Convening on Sex Work, Technology, and Human Rights: Digital Rights for All'. It featured a plenary session followed by three smaller discussion groups and included 21 sex workers working in Belgium, Germany, Greece, Italy, the Netherlands, North Macedonia, Norway, Poland, Spain, Sweden, Switzerland and the UK.

ESWA conducted 15 semi-structured, one-on-one interviews with sex workers and platform representatives via Zoom, lasting approximately one hour each, in English and Dutch. One interview was conducted with a translator from Armenian to English. The sex worker respondents (12) were recruited through ESWA's communication channels, with participants selected to ensure a diversity of racial and gender identities, migration statuses and countries of work based on screening questions. Respondents had experience working in countries including Armenia, France, Germany, Poland, Portugal, Slovenia, Spain, Sweden, Turkey and the UK. Platform representatives (3) were purposefully sampled, representing advertising platforms developed and/or owned by sex workers. These included platforms from Switzerland (Callmetoplay), the UK (KinkyEscortsLondon), and the Netherlands (Wink), the latter still in development. All names used in this report are pseudonyms or names chosen by participants. The data was thematically coded and analysed, focusing on the uses, challenges and priorities of sex workers on platforms and their design, features and policies. The following sections present our findings based on this process.

The Role of Advertising Platforms for Sex Workers

Sex workers engaged in internet-mediated work primarily use advertising platforms to connect with clients, offering an alternative to brothels, street-based work, or non-sex-work-specific platforms such as dating apps or general classifieds. For some respondents, these platforms provided an entry point into sex work. Some began on non-sex-work platforms but shifted to specialised spaces to avoid discrimination and exclusion due to anti-sex work terms of service. Many transitioned from brothels, escort agencies, or massage parlours to online platforms to gain greater independence, while others moved away from street-based work in search of safer, less policed environments.

Although advertising platforms are effective for many, not all sex workers can or choose to rely solely on them. Individual circumstances, the types of sex work they undertake and the legal contexts in which they operate influence platform choices and working methods. For example, some male sex workers find dating platforms more effective for reaching clients less willing to openly seek paid services. Dating and social media platforms allow for one-on-one client interactions without revealing workers' identities as sex workers. However, some workers struggle to find enough clients online and may occasionally return to street-based work. For instance, Emmy, a trans woman from Armenia, sometimes resorts to street work when online bookings are insufficient, which she attributes to economic insecurity and related pressures to lower rates.

To manage risks such as platform closures, technical issues and varying platform features, many sex workers advertise across multiple platforms. Diversifying advertising channels helps mitigate the instability of relying on a single platform. Different platforms also attract different client types, including international clients, higher-paying clients, or those interested in kink-friendly services. Workers specialising in kink often build followings on kink-oriented platforms, connecting with potential clients before directing them to other advertising platforms. While cross-platform strategies are beneficial, they also require sex workers to adapt to each platform's requirements and manage multiple accounts.

Despite varying needs, several common priorities emerge among sex workers on these platforms. Finding clients is paramount, so ease of client access and negotiation is essential. This depends on factors like platform traffic, visibility and search engine optimisation (SEO): *"The platform should be very searchable"*, says Vera. Generally, workers prefer platforms with high traffic, though some opt for smaller, sex worker-led platforms that inspire greater trust or offer preferred features. Having control over how services and prices are communicated in ads is also crucial.

Another key concern is the cost of advertising. Some platforms charge for basic advertising, with one major Swiss platform charging up to 180 CHF (€191) monthly. Additional features, such as site banner promotion, typically require further payment. Even platforms with free basic advertising often charge for 'boosting' ads to visible spots or other services. These fees can be substantial and put pressure on workers to pay to maintain visibility; for example, a 'featured' profile on the Swiss platform costs 350 CHF (€374) monthly. For sex workers in low-income countries who travel for work ('touring') or those with limited income, these upfront costs can be especially burdensome. Although some platforms offer lower fees, such as €50 to be featured on the homepage, these costs can still impose financial strain depending on workers' incomes.

Privacy, safety, and data protection are other significant concerns when working online, consistent with previous ESWA research findings *(ESWA, 2022)*. Diana (Germany) notes, *"The main thing I'm very scared of is a data leak"*. For sex workers, all data is sensitive. They often go to great lengths to protect their privacy from clients, the public, and law enforcement, especially in criminalised environments. Data breaches can have serious

consequences; for example, when the advertising platform Eros was raided, police confiscated sex workers' personal data and IDs, which were handed over to Homeland Security *(Simon, 2017)*. Government bodies or other entities may scrape data from advertising sites to compile sex worker databases for border control or criminal prosecution *(Hamilton et al., 2023)*. One respondent (X, Portugal and Spain) expresses concern about platforms collecting government-issued IDs and biometric scans for age verification purposes, fearing these could be used against her by law enforcement, especially given her racialised identity and vulnerability to police violence and surveillance. *"It's the security thing. I don't want to put all of these explicit things and have them get thrown back in my face...heavens forbid that anything ever happens, or me being stopped [by the police]"*. Sex workers therefore strongly argue for minimising data collection and prioritising data protection and privacy measures on platforms.

In addition to guarding against data breaches, sex workers must also manage what is publicly visible. They often face a balance between advertising services clearly to minimise back-and-forth messaging with clients and limiting personal information that could endanger their safety. This balancing act is evident when sex workers decide whether to post photos with identifiable features, like their faces, to attract clients while maintaining privacy.

> "I'm most worried about being online. That's why I don't put a picture of my full face, because all the content you upload to the internet stays there... It [not showing face] reduced a lot of the work because clients ask for full face pictures. When I upload my ad without my face, it reduces a lot of the contact with the client. Sometimes I had to upload my face because I need to work and I really expose a lot."
>
> **- Alessandra V, Spain**

These choices are often circumstantial and adapt to specific needs. For instance, Alessandra V., a migrant trans woman in Spain, chooses to show her face when struggling to attract clients, while Luka, a non-binary person from Slovenia with a stable income outside of sex work, opts not to upload any photos despite the potential reduction in client contact. *"Fortunately, this is not the income I need to survive... So this is a privilege I have, actually"*, Luka notes. Thus, sex workers make informed decisions, carefully navigating complexities and trade-offs within challenging conditions.

How Platforms Shape Sex Work in a Stigmatised and Legally Repressive Environment

The conditions under which sex workers operate are significantly influenced by the platforms they use, which themselves exist within a broader regulatory, social, and economic environment that frequently stigmatises and criminalises sex work. While platforms control features, design and user interactions, these decisions and their effects are shaped by laws, regulations, and societal attitudes that marginalise sex workers. To understand platforms' roles and impacts on sex workers, it is crucial to consider this broader context.

Law enforcement can leverage platforms for surveillance, raids, and other repressive tactics. For instance, police may locate sex workers through their advertisements. Alessandra V. (Spain) shares, *"The police used passion.com to find my apartment. Once they had the address, they booked an appointment and came to check if there were other girls, what I was doing, and how I ran things"*. Such surveillance, often justified under anti-trafficking measures, can harm sex workers, particularly in criminalised settings as police are frequently cited as primary perpetrators of violence against sex workers, posing severe threats to their occupational safety and emotional well-being *(McBride et al., 2022; Platt et al., 2022)*. This harm is compounded for racialised and migrant sex workers due to racial profiling and anti-immigration policing *(McBride et al., 2022)*.

Laws and regulations directly impact platform operations, as platforms must adhere to the legal frameworks of their operating jurisdictions. These laws often impose restrictive policies on sex work without recognising sex workers as labourers. For example, KinkyEscortsLondon, a UK-based platform, reports being unable to provide advice to new sex workers for fear of third-party criminalisation and facing repressive laws limiting their operations. Platforms that do not prioritise sex workers' needs often adapt to restrictive legislation in ways that harm them. To navigate these regulations, many platforms avoid hosting servers in countries where sex work is criminalised, instead hosting them abroad in jurisdictions that permit or overlook sex work advertisements. In some countries, advertising for escorting services is legally allowed only if the sexual nature of the service is not explicitly stated. This can impede effective advertising, as platforms may prohibit explicit content, leading to confusion in client-worker negotiations. As Alessandra V. (Spain) notes, *"It's very exhausting, and you have to work extra because you have to negotiate"*.
In regions where sex work is legalised and regulated, the legal framework also shapes platform operations. For instance, in the Netherlands, *"complying with the law leads to issues for sex workers. Importantly, the law stipulates that only registered licensed sex workers can advertise"* (J, Netherlands). Platforms registered as companies in the Netherlands are thus required to request ID verification. In some cases, platforms exceed legal requirements; for example, while the legal age for sex work in the Netherlands is 18, some major platforms mandate that workers verify they are at least 21.

ID verification requirements pose significant challenges for sex workers. Collecting personal data, such as government-issued ID, exposes sex workers to potential repression, particularly in criminalised contexts. These ID requirements are especially problematic for migrant sex workers, who may lack legal work authorisation or hold visas prohibiting sex work. Such requirements present barriers and risks for migrant workers. Lola, a trans migrant worker in the UK, shares, *"It was difficult to open an account. I came to the UK on a work visa, and I didn't want to give my ID"*. This exemplifies how platform ID requirements intersect with broader legal frameworks, creating added risks for migrants.

Repression and criminalisation also hinder sex workers' ability to implement safety strategies. Workers report that clients, especially in highly restrictive environments, are often reluctant to provide information for verification or screening. In Sweden, for example, sex workers find clients wary of providing real names or IDs, fearing police tracing due to *"being a super easy target for the police to find"* (Kira). Similarly, recent crackdowns in Spain have driven clients to prioritise anonymity, making it *"hard to follow the trail of a bad client"* (A, Spain). In some cases, platforms exacerbate these issues by prioritising client privacy over sex worker safety, often treating workers as potential [scammers'. This can restrict workers' ability to implement protective measures, such as requiring deposits in advance.

> "They said that if you're escorting, and you ask for payment in advance, it couldn't be more than €10, because they think anyone asking for more is a scammer. But many of us want at least half the payment upfront. They've set a strict limit, and they block accounts that don't comply right away. It's caused a lot of problems for us."
>
> **- Kira, Sweden**

Platforms frequently make decisions that prioritise their business interests over the well-being of sex workers. For example, some platforms prohibit photo editing to 'protect' against scammers yet charge sex workers a fee to blur their faces or recognisable features like tattoos. This monetisation of privacy protections adds a financial burden for workers seeking to safeguard their identities.

Beyond regulatory issues, social stigma further complicates sex workers' experiences on platforms. Repressive legislation, combined with anti-sex work stigma, heightens the risks of being outed or mistreated by clients. These conditions amplify the impact of privacy breaches, requiring sex workers to manage their online visibility meticulously. Many avoid showing their faces or remove ads to minimise police attention. Kira, a cisgender woman in Sweden, notes that working in a criminalised environment where police use platforms for surveillance *"makes me more careful with my ads. If I feel I've had enough interest, I'll take it down just in case. I don't want to risk having it up longer than necessary"*.

While laws and regulations restrict sex workers, they often fail to protect them from unethical platform practices. In some cases, platforms employ coercive tactics to push workers into signing up. For instance, certain platforms allow clients to leave reviews for workers who have not yet created a profile, pressuring them to sign up to manage their online representation. *"This platform also blackmails sex workers into being on the platform by contacting them that they have a review, and then you have to make a profile"*, shares Z, who works in Italy and the UK. Some platforms even scrape and duplicate profiles from other platforms without consent, often lowering prices to drive traffic at the expense of the workers' control over their own content.

> "A lot of new sites just copy other platforms. I've seen my escort ad on a site I didn't even register for because they copied it without my consent. Sometimes they even change the information to get more traffic. I set my price at 600, but they drop it to 200 or 100."
>
> - Kiwi, Poland

These platforms often engage in intimate image abuse, undermining sex workers' control over their working conditions, such as the ability to set their own prices.

To navigate restrictive laws, many platforms are hosted on servers in jurisdictions with minimal regulations. This setup complicates accountability and leaves workers vulnerable to potential data breaches. *"My main concern is because they are based somewhere else, we can't reach them, and we don't really know what they do with our data"*, says Sam from the UK.

Unconsented online exposure not only violates privacy but also weakens workers' ability to negotiate fair prices, as platforms often devalue their services. With limited options to challenge these practices, workers must request that platforms remove illegally duplicated ads or unwanted reviews. These exploitative practices thrive within a regulatory framework that criminalises sex work without protecting sex workers' labour or digital rights.

In this challenging landscape, sex workers must navigate layers of restrictive regulation and platform operations. Although platforms frequently exacerbate these conditions, they also hold the potential for positive change. The following section explores how platforms can improve working conditions for sex workers through practical adjustments in design, features, and policies.

How Platforms Can Contribute to Better Working Conditions for Sex Workers

While sex workers have varied needs from platforms based on their individual situations and experiences, our focus groups and interviews reveal a broad consensus on the design, features, and policies that could enhance working conditions for sex workers on these platforms.

Design and features

Platform aesthetics and ease of use

Platforms need to be easy to navigate and user-friendly, with respondents emphasising the importance of intuitive, modern interfaces. As Leo (Sweden) notes, *"Why have all these websites not been upgraded since the 90s? The looks of the platforms are horrible"*. A *"friendly user interface"* (Alessandra V., Spain) is particularly crucial, as many sex workers operate across multiple platforms.

Counterintuitive designs pose additional challenges for those facing language barriers, especially migrant sex workers. In regions without local platforms, some sex workers must use platforms in foreign languages. Emmy (Armenia) shares, *"It's extremely difficult to register on the platform. And even though it can be in Russian or in English, even Google Translate can face difficulty when translating all the requirements"* (via a translator). This highlights the need for accessible, straightforward interfaces that cater to diverse user needs.

Pricing, listing and descriptions

Sex workers need the ability to clearly describe their services, set prices, and choose their preferred methods of communication with clients. Many respondents emphasise the importance of controlling how they list their services, as these choices affect both safety and workflow. Some opt for minimal descriptions to protect themselves from authorities or difficult clients, while others prefer detailed descriptions to reduce time spent on negotiation and unpaid client interactions. However, all balance these priorities based on their specific needs. As Kiwi, a non-binary person working as a cis-woman in Poland, explains:

> "If I don't [clarify services and pricing], then I have to explain everything through the messages. I sometimes have a lot of people messaging me, and they don't really like the prices. But I've already wasted half an hour, you know talking about specifics of the meeting. [...] [But] when they see that you write a lot of information, they just like, get ideas to talk about with you. And they're just purely time wasters. They never wanted to meet with you, but they wanted to, I don't know, just like, masturbate themselves to messaging [you]. So there are more people coming to you if you specify a lot in your ad."
>
> **- Kiwi, Poland**

Clear descriptions are also essential for those offering niche services or facing multiple marginalisations. Emmy, a trans woman from Armenia, explains that platforms act as a filtering mechanism for clients: *"The platform is like a menu for the consumer. You go into the platform, and you choose your own category. So I know whenever someone writes to me, comes to me or makes a call, I'm definitely to their taste"* (through a translator). This filtering makes it easier for Emmy to find clients interested in her services.

Platforms need to accommodate the need for clear service descriptions while allowing sex workers to control their ads. KinkyEscortsLondon, a worker-led platform for established sex workers, values letting workers create their ads instead of using preset categories:

> "In some directories, you'll have dropdown lists for body type or race. All of us thought those were at best limiting and at worst incredibly misogynist or racist. So we wanted to primarily focus on letting people describe themselves however they want and use whatever words they like. [...] And there's no dropdown lists. It's just a kind of you tell it in your own words if you want to, what your body type is like or how you identify gender-wise or race-wise or anything like that. So we thought we'd give people options because we know, for instance, that some people don't want to mention their race in their advertising, whereas other people are like, no, this is a key part of how I advertise. So rather than have a paternalistic like, 'oh no, we're above all these labels,' we just thought we'll give people as free a choice as possible."

When it comes to pricing, most sex workers prefer listing rates by time, with additional fees for specific services. Callmetoplay, a Swiss platform developed by social workers and sex workers, shares their approach: *"Oh my gosh. We've had so many discussions about prices. In the end, the only solution was: two fields - minutes and money - and the person decides how they correlate"*.

It's also critical for sex workers to update their ads quickly. Slow approval times for changes can be frustrating, as Emmy (Armenia) explains: *"It takes two days to approve any changes. Even if I want to upload a new picture, it takes two days. And in those two days, you can lose clients"* (through a translator). For workers who travel frequently, this flexibility is essential to avoid losing clients. *"I need to be able to change my description immediately. This is especially important when I'm travelling or touring. I cannot wait for them to check it; I need that immediately"* (Diana, European cis-woman migrant in Germany).

Control over communication methods is also important. Many sex workers dislike internal messaging systems as they increase their workload. For example, AdultWork charges fees to list a phone number, forcing those who cannot afford it to rely on internal messaging. *"It's too expensive now, like £2 a day. So now I have to check my AdultWork all the time. I prefer they just text me on my phone; it's like, so much easier for me"* (Lola, UK).

While some prefer encrypted messaging apps like WhatsApp or Telegram, others are frustrated by an influx of unprofessional or unclear messages. Olivia (the Netherlands) describes, *"When I put an ad up on Kinky, I immediately get 30 WhatsApp messages with 'hi' or 'you available?' It drives everyone mad"*. As a result, some workers prefer using email for pre-scheduled dates.

To facilitate client negotiations, the platform Wink has created a communication form for clients to complete for bookings. Sex workers can customise the form, making it as detailed or simple as they choose. Callmetoplay also allows workers to decide between listing a phone number or using a form that sends an email directly to their inbox without making the email publicly visible. Ultimately, while sex workers have varying preferences for advertising, platforms should enable workers to take ownership of their ads and make updates as they see fit.

Safety measures, deposits and screening

Sex workers use a range of safety measures to protect themselves and filter out time-wasters. These may include requesting deposits before meetings and screening clients by asking for their full name and/or identification. As X (Portugal and Spain) explains, *"I ask for deposits. And then they send a photo of themselves and their ID"*. However, these practices are not accessible to all workers. Some avoid deposits or detailed screening due to time constraints or concerns about creating barriers that might deter clients. Alessandra V. (Spain) shares, *"Screening is very difficult because I try to be as fast as I can. I don't negotiate much. If they come with a list of services, I book quickly. I don't do much talking or wasting time"*. Others find it challenging to request documentation.

Collecting deposits can also be logistically challenging. Sex workers need to protect their legal identity from clients, so bank transfers aren't an option. Luka (Slovenia) expresses the need for a solution: *"I would like a payment system where there's a proxy between me and the client, so I could get money transferred without giving them my information"*. While payment apps offer a potential workaround, they carry the risk of de-platforming due to anti-sex work policies *(ESWA, 2022; Redman, 2022)*.

> "If you ask for ID, I'm afraid nobody will send it—they're not used to it. So I always ask for the full name and try to find them, usually on LinkedIn. I almost always do, unless they give a false name. Then I have to use my intuition or just not meet them. Often, I just don't."
>
> **- Diana, Germany**

Platforms can further complicate screening and deposit practices. Some place critical resources, like 'dangerous client' lists, behind paywalls, limiting access for many workers. In Sweden, for instance, platforms restrict deposits to under €10 and close workers' accounts if they ask for more. Similarly, Kiwi faces difficulties asking for deposits and screening in Poland because *"clients get informed by platforms not to trust us, so it's hard to ask for deposits or screen them"*. Platforms often encourage clients to screen sex workers to avoid 'scammers,' normalising a situation where sex workers are expected to verify themselves through photos or videos. This perpetuates stigma by framing sex workers as untrustworthy. Additionally, some platforms prohibit photo editing, labelling it as a 'scammer' tactic. *"I just do not like the rules about not editing and everything because I feel like it's pointed more towards caring for the clients"* (Kiwi, Poland). Such restrictions hinder sex workers' safety practices.

Platforms could play a key role in normalising screening practices and deposits through supportive design features. They should also provide free tools for editing and watermarking to enhance privacy and protect sex workers from online harms, like intimate image abuse *(ESWA, 2023b)*.

Wink's developers, for instance, include a question in their communication form asking whether a client is willing to provide documentation for screening. Encouraging similar features for deposits could be highly beneficial. Many respondents also wanted better ways to track and warn others about problematic clients. While some feel clients should have profiles on platforms, they acknowledge the challenges, as clients can easily delete accounts or refuse to share private information. Luka notes:

> "I'd like to know what kind of experiences other sex workers have had with a client. But I'm not sure how a system like that would work since clients could just make new profiles. Still, some information is better than none."

Platforms must invest in developing practical safety solutions rather than creating additional barriers.

Reviews

A central feature on many advertising platforms is the review system, where clients rate and describe their encounters with sex workers. These reviews significantly impact workers' income: bad reviews can make it harder to attract clients, while good ones can help. As N (UK) remarks, *"Sometimes they're good, at times, not too good"*. Reviews are a contentious issue. Many sex workers view them as problematic, though some recognise the value of positive reviews. *"The community is so divided"*, says Olivia (the Netherlands).

Reviews can lead to various challenges for sex workers, depending on the specific system used by the platform. On some platforms, clients can leave reviews at any time, giving sex workers little control, which can result in uncomfortable or even unsafe situations. J. (the Netherlands) explains, *"Some clients already start blackmailing you in reviews, even without having spoken to you, because you won't offer certain services"*.

While some platforms allow workers to decline reviews, doing so can still harm their profile. Minna (Sweden) describes the dilemma: *"The bad thing is that when you receive a review, you can either accept or decline it without reading it. If you do not accept, they'll state that you have 'not accepted enough reviews'"*. On platforms like AdultWork, only clients who book through the platform can leave reviews, allowing workers to review clients as well. However, even such two-way review systems have limitations. Mafalda (working in Spain and the UK) explains, *"If you're waiting on a review from a client who tried to stealth you or remove the condom, you can't really say that because the client could then respond with their own bad review"*. Clients can also bypass negative reviews by deleting and creating new accounts, which undermines the balance of the system. Additionally, this requirement forces workers to use the platform's internal booking system, which may not suit those who prefer external booking methods.

Despite many workers disliking reviews, there is often a reliance on them. Lola (UK) shares her frustration:

> "I hate it, like I really don't like it. Actually, I hate it. So, I don't use it a lot and I don't know why they are doing it. And I don't want to get any reviews from clients, it is horrible. I don't want it, I don't want it, I don't want to hear their opinion or anything else. Like I don't want to hear anything else or like, I don't know, I hated it, but like, yeah, I need to sometimes get reviews to keep my account. To look like real, you know."

Reviews can sometimes help demonstrate trustworthiness to clients and differentiate a worker in a competitive environment. This potential benefit contributes to positive experiences for some sex workers, often depending on the platform's policies. For example, Rentman changed its policy to allow only premium clients to write reviews, eliminating unverified users.

> "I love reviews. I have 165 reviews up, the most reviews of male sex workers in Norway. This really helps me, because it helps me save a lot of time vetting clients and, most importantly, convince clients I am a real person. Instead of texting back and forth with them, I can just refer them to my ad on the platform with all the reviews. This filters out fake or not serious clients, particularly because they need to pay to check your reviews. This leads to less wasted time."
>
> **- Daniel, Norway**

Sex worker-led platform Tryst does not include a review system, and the developers of Wink are still considering options, aware of the divide within the community. While sex workers have varied opinions on the usefulness of reviews, it is clear that they need control over review systems to ensure safety. Possible solutions could include removing review systems entirely, allowing workers to manage the visibility of reviews on their profiles, limiting reviews to verified users only, and providing a straightforward way for workers to dispute reviews.

Ranking

Platform interfaces typically display only a limited number of advertisements on their homepage and first few pages, meaning many ads are not immediately visible to visitors. To address this, platforms often rank advertisements, with new ads generally receiving more

visibility in their initial days. On many platforms, sex workers must subsequently pay to improve their ranking and visibility. For some workers, such as those based in smaller towns or in specific niches (e.g., based on gender identity), this is less of a concern due to limited competition. However, in more competitive settings, ranking systems can significantly impact workers, who may struggle to afford the fees necessary to move their ads to a more visible position on the platform.

Sometimes, paying for visibility is ineffective because too many workers purchase the same boost, which keeps ads buried. On certain platforms, workers even 'bid' against each other for top positions. As Lola (UK) explains, *"When you pay £50, your advertisement goes to the top. But when another girl pays, yours drops to the second, third, or sixth page. So you have to keep paying £50 just to stay on top. I was paying maybe twice a month, but it became too much, so I stopped"*. In other cases, the paid 'highlights' feature does not function properly due to the platform's design, meaning that even paid visibility does not guarantee effectiveness.

Fairer systems could include randomised rankings, as used by KinkyEscortsLondon, to provide more equitable visibility across all workers. Participants also suggested that platforms could improve their design to ensure visibility for different categories of workers, fostering a more balanced and accessible system for all.

Rules and operation

Costs and subscription systems

Costs and subscription models differ widely across platforms. While only a few operate on a subscription fee basis, most require payment for posting ads, highlighting an ad, or using specific features - some of which are essential for sex workers. Many workers emphasise the importance of keeping these costs low, as rising fees can lead to financial strain, and some cannot afford regular payments. Expressing frustration with AdultWork's frequent price increases, Sam (UK) states, *"They constantly increase fees for no reason"*.

Beyond keeping costs low, platforms could implement payment systems better suited to the flexible and often precarious nature of sex work. Some respondents highlight the need for payment flexibility, which is crucial for workers with inconsistent income. For example, platforms could allow users to pause subscriptions when they are not actively working, helping them avoid costs when they have no revenue. Some worker-led platforms have adopted tiered payment structures or plan to charge fees only when workers receive client inquiries. One platform stands out as entirely free, funded by sex workers and sservice providers, showing an alternative model that supports workers without adding financial burden.

Platform communication and account management

Platform operations significantly impact sex workers' livelihoods and safety, yet these platforms are often unresponsive and lack accountability to the workers they host. Communication quality varies; smaller, sex worker-led platforms tend to be more supportive and responsive, investing in maintaining contact with workers, albeit with limited resources.

For many sex workers, reaching platform representatives is challenging, leaving them reliant on unresponsive systems. When Alessandra V. (Spain) had her advertisement removed, she recalls, *"It was just immediate. They didn't tell you any reasons why you got deleted. Just sent an email saying your ad has been removed but didn't say why"*. In cases of account closures or delays in verification, platforms often provide automated responses with little assistance. As Kiwi (Poland) critiques, *"The platform is mostly made to make money off us. When they respond, they don't really care about anything you need, just [about] their own rules"*. This sentiment echoes across the community, highlighting the need for platforms to improve communication and accountability towards sex workers.

Efficient account management and prompt contact with platforms are essential for sex workers who need to update advertisements and profiles quickly. Fast verification is also crucial, as delays can hinder income generation. However, this can be challenging for platforms, particularly worker-centred ones with limited capacity and manual verification processes. The ability to remove accounts is equally important. Louise (UK) expresses frustration with the lack of control over digital presence:

> "Even if you're just exiting, like, having to fire off emails into the middle of nowhere to, like, there's no one even manning these sites. And you're like, how do I remove this, it is awful. And again, people should have some control over an ad that they've placed and that digital footprint. Or even if they haven't placed it, even if it's just a site that has scraped their data, they should be able to get that taken down."

In some cases, platforms change their systems, leaving sex workers out of possibilities to control their digital presence:

> "There is a website where all of my information is still up, but they have changed the name of the website, so I can no longer log in to take it down or change it. There is no benefit to this site having me on there; you can't book me through it, but still, if you search my name, I am there, and I cannot access it or make any money off it."
>
> **- Elle, Sweden**

Platforms must invest in swift response systems to manage and delete accounts as needed. This is especially important in contexts where sex work is criminalised, where removing one's digital footprint can be crucial for safety.

Age verification, data management and protection

Most platforms require some form of verification when workers set up a profile, often involving a government-issued ID. Additionally, platforms may verify profiles by asking workers to submit photos or videos of themselves in various poses to confirm identity and estimate age. However, verification processes are often unclear, leaving workers unsure why such invasive measures are necessary and lacking reliable information on how their data will be processed and protected. This is particularly risky for migrant workers, those who avoid showing their faces in advertisements, or those not out to people in their personal lives.

> "So in order to get verified there, you have to send an uncovered, unedited video of yourself and then some webmaster will check it and mark your profile as verified, one which I find extremely, extremely bad because I personally hide my face. So I, you know, this thing about letting them see me just in order to get verified. I don't like that. I don't like that at all."
>
> **- Diana, Germany**

Some platforms have also introduced biometric face scans for automated verification. These scans are problematic for sex workers, both for their high inaccuracy rates - especially for women, people with Down syndrome, and racialised people *(Eticas, 2023; Stardust et al., 2024)* - and for the risks associated with the misuse and potential leaking of biometric data (Kelley, 2024). As X (Portugal and Spain) shares, *"That freaked me out because they take like a full 3D face scan. It just feels like the verification processes are getting more and more invasive, and especially with border crossings and stuff, it gives me a lot of anxiety".*

Legislators are increasingly pushing for laws mandating government-issued ID and/or biometric face scans under the pretext of enhancing children's online safety and combating child sexual abuse material (CSAM) *(EDRi, 2024)*. Many EU lawmakers and national governments advocate for mandatory age verification, but digital rights organisations have raised concerns about privacy violations, the processing of sensitive biometric data and the potential for increased surveillance *(EDRi, 2023)*. While these concerns primarily relate to age verification for users on general platforms, similar technologies are already used in sex work advertising platforms, where privacy and data security risks are especially heightened.

Advertising platforms are often vague about their data protection measures, leaving sex workers in need of clearer assurances on data treatment, storage, and security. *"Honestly, for me, data security is the most important thing. I want to know what measures are in place to prevent hacking. I would like assurance about how they protect our data"*, says X (Portugal and Spain). Diana (Germany) adds, *"They don't really promise they will not post it [the photos] somewhere. They only say it will never be posted on your profile. But they never say they will delete it immediately"*. This underscores the urgent need for platforms to commit to data security and transparency, ensuring workers that their information is handled with utmost care.

Regarding age verification technologies, digital rights organisations recommend minimising sensitive data collection, securing data in use, and ensuring it is not retained, linked to legal identity, or used to profile users *(EDRi, 2023)*. Platforms should therefore reduce the amount of stored data and heavily invest in robust data protection. Both platforms and the third-party verification services they use should cease mass collection of biometric data and government IDs, which exposes sex workers to data breaches and potential misuse. Instead, platforms need to invest in secure alternatives for age verification beyond mass data collection. Reflecting these concerns, one worker-centred platform grapples with the government-mandated ID verification requirements: *"Ideally, we don't want their ID at all. We definitely do not want to store it"*. To address this, the platform is exploring privacy-focused, non-digital verification alternatives that minimise the risk of misuse by authorities.

Recommendations and Best Practices: Towards Fairer, Worker-Centred Advertising Platforms

Creating safer, fairer, and more worker-centred platforms requires the decriminalisation of sex work, the protection of sex workers' digital rights, and the inclusion of sex workers' perspectives in platform design and operations. These changes would enable platforms to address the genuine needs of sex workers while safeguarding their rights and well-being.

Decriminalisation of Sex Work

Decriminalising sex work is essential for improving both online and offline working conditions for sex workers. Current anti-sex work legislation—including criminalisation, criminalisation of demand, third-party criminalisation, and other restrictive laws—not only directly exposes sex workers to harm but also indirectly worsens their conditions by forcing platforms to operate in ways that disproportionately impact them. Platforms often comply with or navigate these repressive laws by implementing restrictive rules that limit opportunities for client screening and deposits, thereby heightening risks for sex workers and complicating their work. Furthermore, criminalisation exacerbates privacy risks, increasing sex workers' vulnerability to online harms.

Governments and policymakers must advocate for decriminalisation, as it would transform the legislative and social landscape in which platforms operate, creating the environment for the development of more worker-centred platforms. Removing legal barriers and addressing the stigma surrounding sex work are prerequisites for encouraging platforms to prioritise sex workers' needs without the pressure to comply with laws that undermine their safety and autonomy. Decriminalisation is essential for platforms to design features and rules that truly uphold sex workers' rights, well-being, and livelihoods. Moreover, only through decriminalisation can platforms be held accountable for fostering safer, fairer workplace spaces.

Decriminalisation must be coupled with a focus on sex workers' digital rights, including requirements for robust privacy and data protection measures on platforms. This focus should also address the discrimination sex workers face from financial service providers, such as payment platforms, which frequently ban or exclude sex workers from accessing essential financial services *(ESWA, 2022)*.

Incorporating Sex Workers' Perspectives into Platform Design

To build platforms that truly serve sex workers, it is essential to centre their voices in design and decision-making processes. Platforms should involve sex workers during the development stage and hold regular consultation meetings, reporting back to ensure that the platform meets workers' evolving needs. Some sex worker-led platforms, like KinkyEscortsLondon, hold annual general meetings with all members to incorporate feedback into platform operations, providing a model for inclusive and responsive platform management.

Sex workers have diverse needs based on their type of work, location, and personal circumstances. Platforms can cater to these differences by prioritising worker autonomy within their digital workplaces. Incorporating sex workers' perspectives in platform design and ensuring workers' control would allow for policies and features that support their safety, autonomy, and economic well-being. Several key areas require attention, as outlined in the previous section, to make platforms truly worker-centred.

Data protection and privacy

Platforms should limit the data they collect and store, implementing strong data protection measures to prevent unauthorised access or leaks of personal information that could expose sex workers to legal, social, and physical risks. Secure data storage, transparency in data use, and options for workers to control which information is visible to clients are essential features that must be prioritised.

To support sex workers in managing privacy risks and preventing intimate image abuse, platforms should also invest in accessible, no-cost tools that give workers greater control over their images. In line with recommendations from ESWA's report on intimate image-based abuse *(ESWA, 2023b)*, platforms should implement safety features such as watermarking, automatic metadata removal, sharing management options, password protection, and screenshot and download restrictions for intimate images.

Following digital rights organisations' guidance, platforms should avoid using biometric data for age estimation *(EDRi, 2023)*. Age verification measures should only be employed when necessary, proportionate, and sufficiently secure. Current tools relying on mass ID collection do not meet these criteria. Although arguments for age and identity verification often focus on protecting victims of sexual abuse and trafficking and combating CSAM, the associated risks highlight the need for solutions that protect all victims of online abuse, including sex workers. To achieve this, meaningful dialogue between sex workers' rights organisations, children's rights advocates, and lawmakers is crucial.

Control over listings, descriptions and pricing

Effective client screening and clear communication tools are essential for sex workers to maintain control over their working conditions. Sex workers should be able to express themselves freely, allowing them to present their services effectively and appropriately. They should also be able to set their own prices without interference from platform design or rules that undervalue their services. Platforms must support sex workers in implementing the safety measures they choose, as rules restricting these practices—such as limits on advance payments—undermine workers' agency and their ability to negotiate safely. Additionally, platforms need to support workers' needs to update, verify, and modify accounts and advertisements promptly.

Accessibility of use

Accessibility is crucial to ensure workers can conduct their work easily, efficiently, and safely. Platforms must be user-friendly, designed with sex workers' needs in mind, and offer intuitive tools for managing ads, clients, screening, and communication. Platform rules and features should be clear and easy to understand, with language support for workers who are not fluent in the primary language of the platform, such as migrant workers.

Costs

Platforms should prioritise keeping costs low for sex workers. Essential features related to privacy and safety should be provided free of charge as part of the platform's commitment to protecting all users, including workers.

Education and Resources

Rather than imposing restrictions on sex workers, platforms should focus on educating clients about appropriate behaviour, negotiation and best practices within transactions. Platforms can play a key role by providing clear guidelines and information to clients, creating smoother interactions that benefit both sex workers and clients. It is essential that these resources are developed with sex workers to ensure relevance and accuracy. Sex workers must be compensated for their contributions in developing such materials. Educational materials or tutorials covering respectful communication, the importance of deposits and screening and privacy considerations would contribute to a safer marketplace that centres workers' needs.

Platforms can also serve as valuable information hubs for sex workers. Some already feature dedicated pages providing resources on topics like sexual health, privacy and safety, as well as links to sex workers' rights organisations. Providing this guidance supports sex workers' rights, health and safety, reinforcing a supportive environment on the platform.

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